

# **EXHIBIT A**

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8 Attorneys for Defendant  
ZSCALER, INC.

9  
10 IN THE UNITED STATES DISTRICT COURT  
11 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

13 FINJAN, INC.,

Case No. 3:17-cv-06946-JST

14 Plaintiff,

**DEFENDANT ZSCALER, INC.'S FIRST SET  
OF REQUESTS FOR PRODUCTION OF  
DOCUMENTS AND THINGS TO PLAINTIFF  
FINJAN, INC.**

15 v.

16 ZSCALER, INC.,

Ctrm: 9, 19th Floor  
Judge: Honorable Jon S. Tigar

17 Defendant.

1 prescribed by Rule 26 of the Federal Rules of Civil Procedure.

2 **REQUESTS FOR PRODUCTION**

3 **REQUEST FOR PRODUCTION NO. 1:**

4 All prior settlement agreements, licenses, or other conveyances of rights to one or more of the  
5 Patents-in-Suit or Related Patents or Related Applications, alone or as part of a portfolio or broader set of  
6 patents.

7 **REQUEST FOR PRODUCTION NO. 2:**

8 All prior expert reports or declarations regarding claim construction or invalidity of the Patents-  
9 in-Suit or Related Patents, served by any party in any prior litigation or United States Patent Office  
10 proceeding regarding the Patents-in-Suit or Related Patents.

11 **REQUEST FOR PRODUCTION NO. 3:**

12 All prior expert reports or declarations regarding damages served by Finjan in any prior litigation  
13 regarding the Patents-in-Suit or Related Patents.

14 **REQUEST FOR PRODUCTION NO. 4:**

15 Transcripts of the depositions of any fact or expert witnesses affiliated with Finjan or providing  
16 testimony for Finjan in any litigation regarding the Patents-in-Suit or Related Patents.

17  
18 Dated: April 12, 2018

DURIE TANGRI LLP

19 By: \_\_\_\_\_ /s/ *Sonal N. Mehta*  
20 SONAL N. MEHTA

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22 Attorney for Defendant  
ZSCALER, INC.  
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